

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Schools and Libraries)	CC Docket No. 02-6
Universal Service Support Mechanism)	
)	
Request for Review)	
By ENA Services, LLC)	Application No. 161047376

**REQUEST FOR REVIEW BY ENA SERVICES, LLC
OF A FUNDING DECISION BY THE
UNIVERSAL SERVICE ADMINISTRATIVE COMPANY**

Pursuant to sections 54.719 and 54.722 of the Commission's rules,¹ ENA Services, LLC (ENA)² hereby respectfully requests a review of a Universal Service Administrative Company (USAC) decision to reduce Shelby County (Tennessee) School District's requested E-rate funding for 2016. USAC's reduction of funding, and its subsequent denial of ENA's appeal, rests on USAC's apparent misunderstanding that various services that ENA offers are ordinary Category 1 voice services and are thus eligible for funding. ENA respectfully asks the Commission to reverse USAC's decision and direct USAC to fund the voice services for which Shelby County requested funding.

¹ 47 C.F.R. § 54.719(b), (c); 47 C.F.R. § 54.722(a).

² The SPIN for ENA Services, LLC is 143030857.

TABLE OF CONTENTS

I.	BACKGROUND	4
II.	THE SERVICES FOR WHICH USAC DENIED FUNDING ARE ALL ELIGIBLE INTERCONNECTED VOIP SERVICES	5
III.	CONCLUSION.....	10

EXECUTIVE SUMMARY

As Shelby County's service provider, ENA is appealing USAC's funding decision for funding year 2016 because many of the ENA services that USAC deemed ineligible for E-rate funding are, in fact, eligible services.

ENA believes that USAC's denial of funding for certain services Shelby County wished to purchase from ENA in funding year 2016 stemmed from USAC's unfamiliarity with the brand names ENA uses for those services. ENA hoped that its appeal to USAC, which contained clear explanations of what each service is and how it is typically used, would clear up any confusion or misunderstanding regarding the eligibility of those services, and that USAC would adjust Shelby County's 2016 funding accordingly. But USAC denied ENA's appeal, without explaining why ENA's detailed explanations of its services were insufficient. Accordingly, ENA submits this appeal, in the hope that the Bureau will recognize the eligibility of the services in question and direct USAC to increase Shelby County's 2016 funding commitment accordingly.

I. BACKGROUND

The Shelby County School District comprises city schools in Memphis, Tennessee. It is the largest public school district in Tennessee and the 22nd largest public school district in the United States. Nearly 120,000 students are enrolled in Shelby County schools.

In a funding commitment decision letter (FCDL) issued on February 23, 2017, USAC concluded that certain VoIP voice services that ENA provides to Shelby County were ineligible for E-rate funding.³ Specifically, USAC identified the following ENA services that it believed were not eligible for E-rate funding:

- 411
- ACD Routing/Termination
- Integrated ACD Agent
- Integrated ACD Supervisor
- Auto Attendant
- Loud Ringer
- SmartFax
- SmartVoice Multi Line Hunt Group
- SmartVoice Plus
- SmartVoice Plus + ATA
- SmartVoice Plus Office
- SmartVoice Prime
- SmartVoice Prime + ATA
- SmartVoice Prime + Tele No.
- SmartVoice Prime + Tele No. + ATA
- SmartVoice Pro

Four of these services—411, ACD Routing/Termination, Integrated ACD Agent, and Integrated ACD Supervisor—are indeed ineligible services. It is ENA's understanding that Shelby County inadvertently included them on its application, and later requested that USAC remove those amounts from its application. However, most of the services that USAC identified

³ Exhibit 1, Funding Commitment Decision Letter.

as ineligible—the nine SmartVoice services, Smart Fax, Loud Ringer, and Auto Attendant—are, in fact, Category 1 voice services that *are* eligible for 2016 funding.⁴ These services are all variations on basic VoIP lines. As a result of its conclusion that the services listed above were ineligible for funding, USAC committed \$437,072 in 2016 E-rate funding instead of the \$1,539,458 that Shelby County had requested.⁵

On April 21, 2017, ENA filed a timely appeal of the FCDL.⁶ In its appeal, ENA explained that the services USAC had identified as ineligible were, in fact, eligible services. ENA provided a detailed explanation of each service as proof that all of them were eligible.⁷ On October 14, 2017, USAC denied ENA’s appeal, concluding that ENA “did not show that USAC’s determination was incorrect,” but without providing any further rationale or response.⁸ ENA herein timely files its request for review with the Commission.⁹

II. THE SERVICES FOR WHICH USAC DENIED FUNDING ARE ALL ELIGIBLE INTERCONNECTED VOIP SERVICES

ENA believes that USAC’s denial of funding for certain services Shelby County wished to purchase from ENA in funding year 2016 stemmed from USAC’s unfamiliarity with the brand names ENA uses for those services. ENA hoped that its appeal to USAC, which contained clear

⁴ It is our understanding that Shelby County confirmed USAC’s determination that 411, ACD Routing/Termination, Integrated ACD Agent, and Integrated ACD Supervisor were ineligible for funding. While ENA did not assist Shelby County in preparing its FCC Form 471 application, ENA provided Shelby County with an explanation of the E-rate eligibility of the services listed above, in order to help Shelby County respond to PIA questions from USAC.

⁵ *Id.*

⁶ See Exhibit 2 (USAC Appeal); 47 C.F.R. §§ 54.719(a), 54.720(b).

⁷ See Exhibit 2 (USAC Appeal).

⁸ See Exhibit 3 (USAC Decision on Appeal) at 1.

⁹ 47 C.F.R. § 54.719(b), (c); 47 C.F.R. § 54.720(b).

explanations of what each service is and how it is typically used, would clear up any confusion or misunderstanding regarding the eligibility of those services, and that USAC would adjust Shelby County's 2016 funding accordingly. But USAC denied ENA's appeal, without explaining why ENA's services are not eligible. Accordingly, ENA submits this appeal, in the hope that the Bureau will recognize the eligibility of the services in question and direct USAC to increase Shelby County's 2016 funding commitment accordingly. Because it prepared its appeal without knowing why USAC believes the services are not eligible, and to the extent that any question remains about the eligibility of these services, ENA respectfully requests the opportunity to provide additional explanation before the Bureau renders its decision.

The Commission identifies services that are eligible for E-rate funding in the Eligible Services List (ESL) it releases annually. The ESL for Funding Year 2016 states that interconnected VoIP is an eligible Category 1 service.¹⁰

Twelve of the services that USAC identified as ineligible are actually Category 1 voice services that are eligible for funding in 2016. These services, described in detail in the table below, are all variations on basic VoIP lines; each service is itself a VoIP service and is not an add-on feature to another VoIP connection. ENA designs various VoIP options, including

¹⁰ *Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, Order, 30 FCC Rcd 9923, 9936 Appx. B (Wireline Comp. Bur. 2015) (*2016 Eligible Services List*) (identifying voice service provided over interconnected VoIP as an eligible service for funding year 2016). USAC's ESL Glossary includes the Commission's definition of interconnected VoIP: "a service that (1) enables real-time, two-way voice communications; (2) requires a broadband connection from the user's location; (3) requires Internet protocol-compatible customer premises equipment (CPE); and (4) permits users generally to receive calls that originate on the public switched telephone network and to terminate calls to the public switched telephone network." *Eligible Services List (ESL) Glossary*, http://www.usac.org/_res/documents/sl/pdf/ESL-Glossary.pdf; see also 47 C.F.R. § 9.3 (defining interconnected VoIP).

specific minutes of use, in order to match the voice service as closely as possible to the needs of the user. The following table describes each of the eligible services, along with its typical usage.

Service	Description	Typical Usage
SmartVoice Prime	VoIP/voice line for low-volume users that includes 100 minutes a month.	Typically used by classroom teachers and other staff with lower levels of voice usage.
SmartVoice Prime + Tele No.	VoIP/voice line for low-volume users that includes 100 minutes a month and a telephone number. ¹¹	
SmartVoice Plus	VoIP/voice line for higher-volume users that includes 500 minutes a month.	Typically used by office staff and administrators who have higher levels of voice usage.
SmartVoice Pro	VoIP/voice line for higher-volume users that includes 500 minutes a month; allows users to simultaneously forward calls to one or more alternate phone numbers.	Typically used by the main administrative personnel who manage voice traffic within the school or administrative facility.
SmartFax	Fax service using VoIP.	
Auto Attendant	VoIP/voice circuit that is designated by the customer to route calls to other users within the school or library building based on a simple automated menu.	Typically used to automate certain formerly administrative tasks by having the voice service allow automated connections to various departments or personnel in the school. (SmartVoice Multiline Hunt Group is a very specialized service and is used in only four instances within Shelby County Schools)
SmartVoice Multi Line Hunt Group	VoIP/voice lines that allow for calls to be received and routed within a defined group, usually a main number for a school or department.	

¹¹ ENA's base SmartVoice Prime VoIP service includes a voice line/service without a telephone number for classrooms, so that teachers can make calls and receive calls from within the school, but will not be disturbed by calls from outside parties. In certain situations, the customer desires that teachers or other SmartVoice Prime users have an outside telephone number.

Service	Description	Typical Usage
SmartVoice Plus Office	VoIP/voice line with additional extensions, which allows for routing main telephone numbers to the appropriate district personnel. Service includes 500 minutes per month.	Typically used by office staff and administrators who have higher levels of voice usage.
Loud Ringer	VoIP/voice line featuring a louder than usual ring, typically for use in noisier environments. Service includes 100 minutes per month.	VoIP service typically installed in a loud environment where the user would not necessarily hear a normal ring such as a cafeteria or a gym. (Shelby County uses this configuration for only three lines)
Smart Voice Plus + ATA (Analog Telephone Adapter)	SmartVoice Plus service with a gateway device added to the VoIP service to convert IP/digital signal back to analog.	An ATA is necessary to deliver VoIP service to certain analog devices or systems that school districts maintain. (Shelby County uses this configuration for only two lines)
SmartVoice Prime + Tele No. + ATA	SmartVoice Prime service with a telephone number and a gateway device added to the VoIP service to convert IP/digital signal back to analog.	An ATA is necessary to deliver VoIP service to certain analog devices or systems that school districts maintain. (Shelby County uses this configuration for only two lines)
SmartVoice Prime + ATA	SmartVoice Prime service with a gateway device added to the VoIP service to convert IP/digital signal back to analog.	An ATA is necessary to deliver VoIP service to certain analog devices or systems that school districts maintain. (Shelby County uses this configuration for only one line)

The SmartVoice services listed above are simply voice-grade connections that allow users to receive and make local or long-distance telephone calls, depending upon the type of service purchased by the customer. The SmartVoice service is a VoIP service transiting digital voice traffic over the customer's Internet connections to the applicable end user including the Public Switched Telephone Network (PSTN). SmartVoice is simply the brand name ENA uses to describe these voice services. Each of the different types of SmartVoice represents a different product that is tailored to meet the specific usage needs of the user within the school district.

ENA offers a number of configurations to tailor each VoIP service to the end user's specific needs. One of the primary differentiating characteristics is the number of minutes allocated each month for a specific service. The minutes cap for ENA's Prime, Plus, and Pro services are related to outside PSTN calling and do not necessarily reflect the amount of minutes ENA anticipates each user accessing in total. Minutes of use within their own school system, within their own school, and when calling other ENA customers are not counted against the minutes cap.

For example, SmartVoice Pro subscribers are the real "power users" who spend a lot of time on their phones. This would include, for instance, administrative assistants and receptionists. These users often need additional support. Furthermore, ENA is responsible for proactive maintenance of high-quality, mission-critical voice service and uptime and also interacts with district representatives to evaluate and correct any user experience issues related to the VoIP service.

In short, 12 of the ENA services identified as ineligible by USAC—the nine SmartVoice services, Auto Attendant, Loud Ringer, and SmartFax—are interconnected VoIP voice services and are indisputably eligible for funding. Accordingly, the Bureau should grant this appeal and

direct USAC to commit the appropriate monthly amount of funding for these eligible services.

The ineligible services – 411, ACD Routing/Termination, Integrated ACD Agent, and Integrated ACD Supervisor – account for \$665.00 in monthly charges requested.¹² As such, USAC should commit \$127,192.04 per month (50% of the pre-discount \$254,384.08 per month) to Shelby County for the eligible voice services described above.

III. CONCLUSION

For the foregoing reasons, the Bureau should grant ENA's request for review and direct USAC to fund Shelby County's 2016 funding request as described herein.

Respectfully submitted,

/s/ Gina Spade

Gina Spade
Broadband Legal Strategies
1629 K Street, NW Suite 300
Washington, DC 20006
DC Bar # 452207
gina@broadbandlegal.com
202-907-6252

Counsel for ENA Services, LLC

December 13, 2017

¹² The 411 service is \$120/month; the ACD routing/termination charge is \$500/month; the integrated ACD agent is \$35/month; the integrated ACD supervisor is \$10/month. The total monthly charges for the ineligible services are \$665.

CERTIFICATE OF SERVICE

This is to certify that on this 13th day of December 2017, a true and correct copy of the foregoing Request for Review was sent via email to:

SLD, Universal Service Administrative Company, Appeals@sl.universalservice.org

/s/ Theresa Schrader

Exhibit 1

Funding Commitment Decision Letter

FRN	FRN Status	471 Application Number	BEN	Billed Entity Name	Applicant City	Applicant State	Service Provider Name	Fund Year	Orig FRN Service Type	Orig Total Cost	Cmtd Total Cost	Orig Funding Request	FRN Committed Amount	FCDL Comment for FRN
1699107616	Funded	161047376	128440	SHELBY COUNTY SCHOOL DISTRICT	MEMPHIS	TN	ENA Services, LLC	2016	Voice	\$3,078,915.84	\$874,143.84	\$1,539,457.92	\$437,071.92	MR1:FRN modified in accordance with a RAL request.;MR2:The Monthly Recurring Cost for FRN Line Item 1 was modified from \$18.48 to \$18.37 to agree with the applicant documentation.;MR3:The amount of the funding request was changed from \$255,049.08/mo to \$72,845.32/mo to remove the ineligible service(s): 411 \$120.00, ACD Routing/Termination \$500.00, Auto Attendant \$6,240.00, Integrated ACD Agent \$35.00, Integrated ACD Supervisor \$10.00, Loud Ringer \$52.50, SmartFax \$12,450.00, SmartVoice Multi Line Hunt Group \$80.00, SmartVoice Plus \$54,640.00, SmartVoice Plus + ATA \$50.00, SmartVoice Plus Office16 \$1,248.39, SmartVoice Prime \$77,083.92, SmartVoice Prime + ATA \$14.50, SmartVoice Prime + Tele No. \$20,475.00, SmartVoice Prime + Tele No. + ATA\$31.00, & SmartVoice Pro \$14,525.00.

Exhibit 2

ENA's Appeal to USAC

April 21, 2017

Letter of Appeal
Universal Service Administrative Company
Schools and Libraries Division – Correspondence Unit
30 Lanidex Plaza West
P.O. Box 685
Parsippany, NJ 07054-0685

Re: Appeal of Funding Request of Shelby County, BEN 128440

Dear Schools and Libraries Division:

ENA Services, LLC (ENA)¹ hereby respectfully submits this appeal of a decision by the Universal Service Administrative Company (USAC) to reduce Shelby County (TN) School District's requested E-rate funding for 2016:²

Funding Year	Form 471#	FRN#	FCDL
2016	161047376	1699107616	02/23/2017

Contact:

/s/ Gina Spade

Gina Spade
Broadband Legal Strategies
1629 K Street, NW Suite 300
Washington, DC 20006
gina@broadbandlegal.com
202-907-6252

¹ The SPIN for ENA Services, LLC is 143030857.

² See Exh. A, FRN report from USAC DTR.

USAC's Reason for Reducing Funding

In the Funding Commitment Decision Letter issued February 23, 2017, USAC concluded that certain VoIP voice services that ENA provides to Shelby County were ineligible for E-rate funding.³ Specifically, USAC identified several services that it believes are not eligible for E-rate funding:

- 411
- ACD Routing/Termination
- Integrated ACD Agent
- Integrated ACD Supervisor
- Auto Attendant
- Loud Ringer
- SmartFax
- SmartVoice Multi Line Hunt Group
- SmartVoice Plus
- SmartVoice Plus + ATA
- SmartVoice Plus Office
- SmartVoice Prime
- SmartVoice Prime + ATA
- SmartVoice Prime + Tele No.
- SmartVoice Prime + Tele No. + ATA
- SmartVoice Pro

Background and Summary

In its decision on this funding request, USAC committed \$437,072 in E-rate funding to Shelby County instead of the \$1,539,458 it had requested.⁴ ENA is the service provider Shelby County selected to provide those services. ENA is appealing this funding decision because many of the ENA services that USAC deemed ineligible for E-rate funding are, in fact, eligible services.

The SmartVoice services listed above are simply voice-grade connections that allow users to receive and make local or long-distance telephone calls, depending upon the type of service purchased by the customer. SmartVoice is the brand name ENA uses to describe these voice services. Each of the different types of SmartVoice represents a different product that is tailored to meet the specific usage needs of the user within the school district. The SmartVoice service is a VoIP service transiting digital voice traffic over the customer's Internet connections to the applicable end user including the Public Switched Telephone Network (PSTN).

ENA therefore respectfully requests that USAC revise its funding decision accordingly and award Shelby County the amount of funding it requested for the eligible services.

³ *Id.*

⁴ *Id.*

Analysis

The Federal Communications Commission identifies services that are eligible for E-rate funding in the Eligible Services List (ESL) it releases annually. The ESL for Funding Year 2016 states that interconnected VoIP is an eligible Category 1 service.⁵

While it appears that Shelby County may have inadvertently included the charges for a few minor ineligible services on its application and requested that USAC remove those amounts from its application, the majority of services that USAC said were ineligible *are* eligible services.⁶ Specifically, 12 of the items on USAC's list – all of the SmartVoice services, Smart Fax, Loud Ringer and Auto Attendant – are Category 1 voice services that are eligible for funding in FY 2016. These services are all variations on basic VoIP lines; ENA designs various options, including specific minutes of use, in order to match the voice service as closely as possible to the needs of the user. Each of these services represents a separate VoIP service and is not an add-on feature to another VoIP connection.

ENA offers a number of configurations to tailor each VoIP service to the end user's specific needs. One of the primary differentiating characteristics is the number of minutes allocated each month for a specific service. The minutes cap for Prime, Plus and Pro are related to outside PSTN calling and do not necessarily reflect the amount of minutes ENA anticipates each user accessing in total. Minutes of use within their own school system, their own school and when calling other ENA customers are not counted against the minutes cap.

For example, SmartVoice Pro are the real “power users,” that is the users that spend a lot of time on their phones. This would include, for instance, administrative assistants and receptionists. These users often need additional support. Furthermore, ENA is responsible for proactive maintenance of high quality mission critical voice service and uptime and also interacts with district representatives to evaluate and correct any user experience issues related to the VoIP service.

⁵ *Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184, Order, 30 FCC Rcd 9923, 9936 Appx. B (Wireline Comp. Bur. 2015) (*2016 Eligible Services List*) (identifying voice services provided over interconnected VoIP as an eligible service for funding year 2016). USAC's ESL Glossary includes the FCC's definition of interconnected VoIP: “a service that (1) enables real-time, two-way voice communications; (2) requires a broadband connection from the user's location; (3) requires Internet protocol-compatible customer premises equipment (CPE); and (4) permits users generally to receive calls that originate on the public switched telephone network and to terminate calls to the public switched telephone network.” *Eligible Services List (ESL) Glossary*, http://www.usac.org/_res/documents/sl/pdf/ESL-Glossary.pdf; see also 47 C.F.R. § 9.3 (defining interconnected VoIP).

⁶ It is our understanding that Shelby County confirmed USAC's determination that 411, ACD Routing/Termination, Integrated ACD Agent, and Integrated ACD Supervisor were ineligible for funding. While ENA did not assist Shelby County in preparing its FCC Form 471 application, ENA provided Shelby County with an explanation of the E-rate eligibility of the services listed above, in order to help Shelby County respond to the PIA questions.

Below is a table that describes each of the eligible services, along with their typical usage:

Service	Description	Typical Usage
SmartVoice Prime	VoIP/voice line for low-volume users that includes 100 minutes a month.	Traditionally used by classroom teachers and other staff with lower levels of voice usage.
SmartVoice Prime + Tele No.	VoIP/voice line for low-volume users that includes 100 minutes a month and a telephone number. ⁷	
SmartVoice Plus	VoIP/voice line for higher-volume users that includes 500 minutes a month.	Traditionally used by office staff and administrators who have higher levels of voice usage.
SmartVoice Pro	VoIP/voice line for higher-volume users that includes 500 minutes a month; allows users to simultaneously forward calls to one or more alternate phone numbers.	Traditionally used by the main administrative personnel who manage voice traffic within the school or administrative facility.
SmartFax	Fax service using VoIP.	
Auto Attendant	VoIP/voice circuit that is designated by the customer to route calls to other users within the school or library building based on a simple automated menu.	Typically used to automate certain formerly administrative tasks by having the voice service allow automated connections to various departments or personnel in the school. (SmartVoice Multiline Hunt Group is a very specialized service and is used in only four instances within Shelby County Schools)
SmartVoice Multi Line Hunt Group	VoIP/voice lines that allow for calls to be received and routed within a defined group, usually a main number for a school or department.	

⁷ ENA's base SmartVoice Prime VoIP service includes a voice line/service without a telephone number for classrooms, so that teachers can make calls and receive calls from within the school, but will not be disturbed by calls from outside parties. In certain situations, the customer desires that teachers or other SmartVoice Prime users have an outside telephone number.

Service	Description	Typical Usage
SmartVoice Plus Office	VoIP/voice line with additional extensions, which allows for routing main telephone numbers to the appropriate district personnel. Service includes 500 minutes per month.	
Loud Ringer	VoIP/voice line featuring a louder than usual ring, typically for use in noisier environments. Service includes 100 minutes per month.	<p>VoIP service typically installed in a loud environment where the user would not necessarily hear a normal ring such as a cafeteria or a gym.</p> <p>(Shelby County uses this configuration for only three lines)</p>
Smart Voice Plus + ATA (Analog Telephone Adapter)	SmartVoice Plus service with a gateway device added to the VoIP service to convert IP/digital signal back to analog.	<p>An ATA is necessary to deliver VoIP service to certain analog devices or systems that school districts maintain.</p> <p>(Shelby County uses this configuration for only two lines)</p>
SmartVoice Prime + Tele No. + ATA	SmartVoice Prime service with a telephone number and a gateway device added to the VoIP service to convert IP/digital signal back to analog.	<p>An ATA is necessary to deliver VoIP service to certain analog devices or systems that school districts maintain.</p> <p>(Shelby County uses this configuration for only two lines)</p>

Service	Description	Typical Usage
SmartVoice Prime + ATA	SmartVoice Prime service with a gateway device added to the VoIP service to convert IP/digital signal back to analog.	An ATA is necessary to deliver VoIP service to certain analog devices or systems that school districts maintain. (Shelby County uses this configuration for only one line)

In short, 12 of the ENA services identified as ineligible by USAC—the nine SmartVoice services, Auto Attendant, Loud Ringer, and SmartFax—are in fact eligible interconnected VoIP voice services.⁸ Accordingly, USAC should grant this appeal and commit the appropriate monthly amount of funding for these eligible services as detailed above. The ineligible services – 411, ACD Routing/Termination, Integrated ACD Agent, and Integrated ACD Supervisor – account for \$665.00 in monthly charges requested.⁹ As such, USAC should commit \$254,384.08 per month to Shelby County for the eligible voice services described above.¹⁰

	Monthly	Annual
Funding Approved	\$72,845.32	\$874,143.84
Addback Eligible Items per Appeal	\$181,538.76	\$2,178,465.12
Funding Requested per Appeal	\$254,384.08	\$3,052,608.96

Conclusion

In conclusion, ENA asks that USAC revise its funding decision to grant Shelby County the full funding that it requested for the eligible services as described above. ENA hopes that with this appeal, it has resolved any confusion or misunderstanding regarding the brand names of its services.

⁸ It is ENA's understanding that Shelby County's consultant may have identified three of ENA's services—SmartVoice Plus Office, SmartVoice Multi Line Hunt Group, and Loud Ringer—as ineligible services in its PIA response. To be clear, these three services are all interconnected VoIP voice services and are thus eligible for E-rate support.

⁹ The 411 service is \$120/month; the ACD routing/termination charge is \$500/month; the integrated ACD agent is \$35/month; the integrated ACD supervisor is \$10/month. The total monthly charges for the ineligible services are \$665.

¹⁰ The numbers in this table are pre-discount totals. We started with the \$255,049.08 monthly amount that is listed within MR3 in the FCDL comment. See Exh. A.

FRN	FRN Status	471 Application Number	BEN	Billed Entity Name	Applicant City	Applicant State	Service Provider Name	Fund Year	Orig FRN Service Type	Orig Total Cost	Cmtd Total Cost	Orig Funding Request	FRN Committed Amount	FCDL Comment for FRN
1699107616	Funded	161047376	128440	SHELBY COUNTY SCHOOL DISTRICT	MEMPHIS	TN	ENA Services, LLC	2016	Voice	\$3,078,915.84	\$874,143.84	\$1,539,457.92	\$437,071.92	MR1:FRN modified in accordance with a RAL request.;MR2:The Monthly Recurring Cost for FRN Line Item 1 was modified from \$18.48 to \$18.37 to agree with the applicant documentation.;MR3:The amount of the funding request was changed from \$255,049.08/mo to \$72,845.32/mo to remove the ineligible service(s): 411 \$120.00, ACD Routing/Termination \$500.00, Auto Attendant \$6,240.00, Integrated ACD Agent \$35.00, Integrated ACD Supervisor \$10.00, Loud Ringer \$52.50, SmartFax \$12,450.00, SmartVoice Multi Line Hunt Group \$80.00, SmartVoice Plus \$54,640.00, SmartVoice Plus + ATA \$50.00, SmartVoice Plus Office16 \$1,248.39, SmartVoice Prime \$77,083.92, SmartVoice Prime + ATA \$14.50, SmartVoice Prime + Tele No. \$20,475.00, SmartVoice Prime + Tele No. + ATA\$31.00, & SmartVoice Pro \$14,525.00.

Exhibit A

Exhibit 3

USAC's Decision on Appeal

ENA Services, LLC|143030857|2016|SHELBY COUNTY SCHOOL DISTRICT|3772 Jackson Ave||MEMPHIS|TN|38108|128440|Shawandra Ford|EMAIL|3772 Jackson Ave||MEMPHIS|TN|38108|||901|4165038||fordsl@scsk12.org|161047376|1699107616|FUNDED|Voice|160017344|2-225071-08||07/01/2016|06/30/2021|12|874143.84|0.00|874143.84|50|437071.92|Your FCC Form 471 application included costs for the following ineligible products and or services: 411 charges, CD Routing/Termination, Auto Attendant, Integrated ACD Agent, Integrated ACD Supervisor, Loud Ringer, SmartVoice Multi Line Hunt Group, SmartVoice Plus, SmartVoice Plus with ATA, SmartVoice Plus Office, SmartVoice Prime, SmartVoice Prime with Tele No., SmartVoice Prime with Tele No. and ATA, SmartVoice Pro. USAC has given you an opportunity to provide the appropriate additional documentation demonstrating the eligibility of the products and/or services requested and you failed to do so. Accordingly, your funding request was reduced in accordance with USAC's determination. In your appeal, you did not show that USAC's determination was incorrect. Consequently, your appeal is denied.

FCC rules provide that funding may be approved only for eligible products and services. See 47 C.F.R. secs. 54.502. The USAC website contains a list of eligible products and services. See Eligible Services List posted in the Reference Area of the SLD section of the USAC website. FCC rules further require that if 30% or more of the applicant's funding request includes ineligible products and/or services, then the funding request must be denied, otherwise the funding request will be reduced accordingly. See 47 C.F.R. sec. 54.504(b). The FCC's Aiken County Public Schools Order directed USAC to permit the applicant 15 calendar days from the date of receipt of notice in writing by USAC to revise its funding request to remove the ineligible services or allow the applicant to provide additional documentation to show why the services are eligible. See Requests for Review of the Decisions of the Universal Service Administrator by Aiken County Public Schools, Aiken, South Carolina, et al., Schools and Libraries Universal Service Support Mechanism, File Nos. SLD-397612, et al., CC Docket No. 02-6, Order, 22 FCC Rcd 8735, FCC 07-61 para. 11 (May 8, 2007).||10/14/2017|25|06/30/2017|||

SLD 471 Funding to Service Provider; Total Records: 1